

TECHNICAL MEMORANDUM

April 16, 2021

To:	Ms. Gretchen Brunner EA Engineering, Science, and Technology, Inc.
From:	Richard W. Lundquist, M.S., President /Wildlife Biologist Andrew J. Rossi, B.S., Wildlife Biologist Raedeke Associates, Inc.
RE:	47° N DSEIS – Supplemental Information to Draft SEIS Wetlands, Plants, & Animals (R.A.I. No. 2019-084-004)

Upon review of the Draft Supplemental Environmental Impact Statement (DSEIS) for the 47° North/Bullfrog Flats project, the Washington Department of Fish and Wildlife (WDFW) requested additional information regarding the potential impacts to wildlife species and habitats that were discussed in the DSEIS. Those comments from WDFW were received from EA Engineering, Science, and Technology, Inc. on November 9, 2020. The purpose of this technical memorandum is to provide additional information and disclose probable impacts to the specific species and habitats requested by WDFW.

1.0 REGULATED SPECIES INFORMATION IN THE DRAFT SEIS

The plants and animals report for the Draft SEIS (Appendix E; Raedeke Associates, Inc. 2020) provided information on all Washington Department of Fish and Wildlife (WDFW 2008, as updated) Priority Habitats and Species (PHS) listed species that are indicated as potentially occurring at the project site by the WDFW (2019) online PHS mapper. The report also discussed all federally listed species from the USFWS Information for Planning and Consultation (IPaC) list (USFWS 2019). Potential occurrence was indicated, as well as probable impacts for many of these species. These species include gray wolf, northern spotted owl, wolverine, grizzly bear, Canada lynx, elk, Columbia spotted frog, sharp-tailed snake, bald eagle, and pileated woodpecker (see DSEIS Appendix E).

Regarding the gray wolf, the report addressed the potential for wolves occurring within the project site, but it is worth noting that trail cameras posted at the adjacent Suncadia property have photo documentation of occasional occurrence of wolves on that property,

further confirming the assertion that wolves could occur within the 47° N / Bullfrog Flats project boundaries.

2.0 WASHINGTON STATE WILDLIFE ACTION PLAN (SWAP)

At the recommendation of WDFW (Jennifer Nelson, Scott Downes, WDFW, Pers. Comm. November 2020) cinnamon teal (*Anas cyanoptera*) and band-tailed pigeon (*Patagioenas fasciata*) should also be addressed with respect to the conservation concerns in the Washington State Wildlife Action Plan (WDFW 2015). The SWAP is a comprehensive plan for conserving the state's fish and wildlife and the natural habitats on which they depend, with particular focus on Species of Greatest Conservation Need (SGCN), as identified by the state (WDFW 2015).

The cinnamon teal (so named because of its cinnamon coloration) is a dabbling duck located in Washington during the breeding season and migrates to warmer southern wintering areas in late summer. Although not listed federally, nor in the State of Washington or on the PHS list, the cinnamon teal is of conservation concern due to its approximate 3.3 percent decline in population numbers each year from 1968 to 2012. Their primary habitat consists of dense upland vegetation (for nesting) located near freshwater ponds and lakes with emergent vegetation. They could occur on or near the site in the Cle Elum River and associated wetlands, such as Wetlands 1, 2 and 3 on the project site and in Bullfrog Pond immediately north on the Suncadia site. The smaller, isolated wetlands (Wetlands 4, 5, and 6), located in the central portion of the project site, which consist of scrub-shrub and forested communities, do not likely have sufficient ponding or inundation to support cinnamon teal.

The most relevant conservation stressor to the 47° N / Bullfrog Flats project in terms of cinnamon teal is the loss or degradation of wetlands due to hydrologic impacts from development. The higher-quality, more inundated wetlands (Wetlands 1, 2 and 3) along the river that could provide high quality habitat for cinnamon teal would be preserved within the river corridor with hydrologic conditions unaffected under SEIS Alternative 6, as well as the other alternatives evaluated in the Draft SEIS. Consequently, neither SEIS Alternative 5 or 6 are expected to impact cinnamon teal.

Band-tailed pigeons are a bird associated primarily with conifer or mixed hardwood and conifer forests west of the cascade crest. Band-tailed Pigeons prefer forest edges, open sites bordered by tall conifers, and they roost in thick conifers. Their habitat availability has been influenced by timber harvesting in recent years. In the early breeding season, mineral springs and tidal flats become important for supplementation to their diet. It is thought that the suppression of a broadleaf/shrub understory layer in managed forests is having a negative impact on band-tailed pigeon populations.

The band-tailed pigeon is not federally listed, nor listed in Washington state. It is listed in the PHS list as a Species of Recreational, Commercial, and/or Tribal Importance, although it is not listed in Kittitas County. This species is not mapped as occurring at the project site by the WDFW (2019) PHS mapper, and because it is mostly associated with closed canopy forests west of the cascade crest, it is not expected that band-tailed pigeons would occur regularly on the project site. This species was not detected on the site or vicinity in previous studies (Raedeke Associates, Inc. 1999). No mineral springs are known to occur on the site or vicinity. The development alternatives would reduce the amount of forest habitat available to this species, but because they are unlikely to occur on site, the project is not expected to adversely affect this species.

3.0 SPECIES AND HABITATS OF GREATEST CONSERVATION NEED LISTS

The project site appears to be located within the Northern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest Type of the Species of Greatest Conservation Need / Habitats of Greatest Conservation Need lists. The Species of Greatest Conservation Need (SGCN) list indicates 11 species closely associated with this habitat type. Chapter 4 of the SWAP (WDFW 2015) states “This widespread eastern Washington system includes a number of closely associated SGCN birds (pygmy nuthatch, white-headed woodpecker, Mountain Quail, Great Gray Owl, Golden Eagle, and Flammulated Owl), Mammals (Lynx, Western Gray Squirrel) and Reptiles (California Mountain Kingsnake, Sharp-tailed Snake). Old growth forest structure, snags and downed wood are key habitat features for species closely associated with this system.”

The pygmy nuthatch (*Sitta pygmaea*) is a small, clinging songbird that is strongly associated with old ponderosa pine forests. The forests provide cavities for nesting, as well as a source of food throughout the year. Currently the pygmy nuthatch is considered a species of concern in the State of Washington because of its dependence on old Ponderosa pine forests (WDFW 2021b). At the 47° North / Bullfrog Flats project site, this species would most likely be associated with the forest communities dominated by Ponderosa pine, as shown in Figure 3 of the plants and animals report for the Draft SEIS (see DSEIS Appendix E). Given the history of timber management on the site, these areas do not necessarily have mature ponderosa pine forests but would likely contain the tree species composition sufficient to support individuals of this species. This species was not observed on site or in the vicinity during previous or recent investigations. The SEIS Alternatives would remove some potential habitat for this species on site. However, portions of the Ponderosa pine dominated forest habitat, particularly in the river corridor, the slopes west of the proposed RV park, and in habitat corridors in the eastern part of the site, would be retained under SEIS Alternatives 5 and 6.

The white-headed woodpecker (*Picoides albolarvatus*) is currently not listed federally, and it is currently a candidate species listed by Washington state, with breeding sites and regular occurrences considered Priority Areas in Washington (WDFW 2008). This

woodpecker is found on the eastern slopes of the Cascade Mountains and is associated with open canopy, mature and old-growth ponderosa pine forest (Larsen, Azerrad, and Nordstrom 2004). The Washington SWAP as well as the PHS management recommendations indicate that this species is sensitive to the loss of this type of mature ponderosa pine forest. Similar to the pygmy nuthatch, this species could be associated with the Ponderosa pine dominated forest stands on site. These areas do not necessarily have mature ponderosa pine forests but would likely contain the tree species composition sufficient to support individuals of this species. This species was not observed on site or in the vicinity during past or recent investigations, and habitat elements for this species are limited, without an abundance of large Ponderosa pine snags (no concentrations of such snags have been observed on site). As for pygmy nuthatches, both SEIS Alternative 5 and 6 would retain some areas of pine-dominated forest on site.

Mountain Quail (*Oreortyx pictus*) is not currently listed federally, nor by the state of Washington, but is included on the WDFW (2008) PHS list as a priority species of Recreational, Commercial, and/or Tribal Importance. This species is thought to have declined due to loss of dense shrub communities in riparian zones. Mountain Quail are found in dense cover with scattered open areas on slopes in foothills and mountains, and in summer they require a source of water (Seattle Audubon Society 2021b). Range maps from the WDFW (2008) PHS documents, and Cornell (2019) and Seattle Audubon Society (2021b) online resources do not indicate the range of mountain quail to include the project site, vicinity, or Kittitas County, but the species has been introduced in several areas, including the eastern Cascades. This species was not observed on site during previous or recent investigations, and the nearest documented sightings of mountain quail are 2 miles to the east of the property, in Section 26, Township 20 North, Range 15 East, and approximately 5 to 8 miles to the east-southeast of the property, in Section 24, 29, and 33, Township 20 North, Range 16 East. The majority of the potential riparian, densely shrubby habitat at the 47° North / Bullfrog Flats project site is planned to be retained within the Cle Elum River corridor under SEIS Alternatives 5 and 6, so the project is not expected to adversely impact this species.

Great Gray Owls (*Strix nebulosa*) are currently not listed federally but are considered a Species of Greatest Conservation Need by the state of Washington. They are not listed on the WDFW (2008) PHS list. This large owl, one of the least-studied owl species in the state, is a rare local breeder in parts of northern Washington, such as the Okanogan Highlands (and perhaps other locations), and a rare winter visitor elsewhere in the state (Seattle Audubon Society 2021a, WDFW 2021a) eastern Washington. These owls are primarily found between 2,500 feet and 7,500 feet elevation in conifer forests adjacent to montane meadows. Because the known range of this species is far from the site and the habitat characteristics of the site do not match those preferred by the great gray owl, this species is not expected to be present at the 47° North / Bullfrog Flats project site.

Golden Eagles (*Aquila chrysaetos*) are a large raptor that can be found throughout much of Washington state. They are primarily associated with open plateaued areas with many

cliffs, often adjacent to streams or rivers that have been deeply channelized into canyons. The species can, however, be found nesting in mature or old growth conifers near clearcuts. The general range (Larsen, Azerrad, and Nordstrom 2004) of the golden eagle extends through the project site, but none were observed on the site or vicinity during previous or recent studies (Raedeke Associates, Inc. 1999, 2020), and the WDFW (2019) PHS maps contain no records on the site or in the vicinity. No golden eagle nests are currently known to occur regularly on the 47° North / Bullfrog Flats project site. Occasional migrants are seen throughout the surrounding area during spring. Potentially suitable nesting cliffs exist approximately 7 miles north of the Suncadia property at the Dry Creek Cliffs. Because golden eagles are not expected to find particularly suitable habitat on site, neither SEIS Alternative 5 or 6 are expected to have significant adverse impacts on golden eagles.

A small raptor, the Flammulated Owl (*Otus flammeolus*) is associated primarily with mid-elevation coniferous forests (Larsen, Azerrad, and Nordstrom 2004). This species is listed as a Candidate Species in the State of Washington, with breeding sites and areas of regular occurrences considered Priority Areas (WDFW 2008). The flammulated owl is not currently listed federally. The WDFW (2019) PHS database contained no records of flammulated owl observations or breeding sites on the site or in the vicinity. Flammulated owls were not observed or detected at the 47° site during previous wildlife investigations of the site and vicinity by Raedeke Associates, Inc. (1999) or during field investigations since. Calling flammulated owls had been heard farther up the Cle Elum drainage at Morgan Creek and to the south in the Taneum Creek drainage (Raedeke Associates, Inc., staff observations; see Raedeke Associates, Inc. 1999). Flammulated owls could forage on the property within ponderosa pine and grand fir/Douglas-fir forests with relatively open canopies and understories. Flammulated owls could potentially find breeding habitat on site or in the vicinity in the limited areas of older forests of these types, which have denser understory vegetation and a more multiple-layered structure, but the suitability of these areas would be limited by available snags, and the 47° North site generally lacks older pine forests. Conversion of forested areas on the 47° N / Bullfrog Flats project site to urban uses with SEIS Alternatives 5 and 6 could reduce potential foraging in this location for some individuals of this species but is unlikely to impact any breeding pairs of flammulated owls at the project site.

Canada lynx (*Lynx canadensis*) were discussed in both the MountainStar EIS (Raedeke Associates, Inc. 1999), as well as the 47° North Draft SEIS (Raedeke Associates, Inc. 2020). As previously mentioned, because of the fragmented, forested habitat, elevation below 4,000 feet, and high human activity, Canada lynx are not expected to use the immediate vicinity of the 47° North / Bullfrog Flats project location. Observations during the October 2019 investigation found no indication there were changes to suitable habitat at the project location.

Western gray squirrels (*Sciurus griseus*) are not currently listed federally but are listed as threatened in the state of Washington. This species' range has greatly contracted in recent

years and is currently restricted to three distinct populations in north-central Washington (western Okanogan and northern Chelan Counties), south-central Washington (Klickitat and southern Yakima Counties), and at Joint Base Lewis-McChord in Pierce and Thurston Counties (Linders et al. 2010; WDFW 2015). This species is associated with transitional areas of conifer forest that meet their need for open patches of oaks and other deciduous trees. They also prefer areas that have patches of trees with dense canopy cover to provide visual screening from their nests, as well as escape cover and growing conditions for preferred food sources. Because of their well-documented and restricted range (Linders et al. 2010) it is not expected that western gray squirrels would occur at the 47° North / Bullfrog Flats project site.

The California mountain kingsnake (*Lampropeltis zonata*) is a Washington state candidate species (WDFW 2008), but it is not listed federally. Washington is the northern extreme edge of the range of the California mountain kingsnake and this species is only known to occur in Washington in the Columbia River Gorge area (Larsen 1997). Because of this, this species is not expected to occur at the project site.

The sharp-tailed snake (*Contia tenuis*) was discussed briefly in the 47° North Draft SEIS report (Raedeke Associates, Inc. 2020) as well as in the MountainStar EIS (Raedeke Associates, Inc. 1999). This species may utilize the riparian zones of the Cle Elum River corridor, as well as edges between forested communities and open meadow communities. Sharp-tailed snakes occur in damp conditions and at lower temperatures (50° to 63° F) than most other snake species. This species is listed as a candidate species in Washington state (WDFW 2008). Both the WDFW (2019) PHS map and Elizabeth Torrey at WDFW (personal communication 2020) confirmed occurrences of this species near the project site south of I-90, in the complex of wetlands and riparian areas along the Yakima River. It is possible that this species is utilizing this site, especially in the open space areas near the Cle Elum River and within the wetland areas found on-site. As discussed in the plants and animals report for the Draft SEIS (Raedeke Associates, Inc. 2020), the most suitable habitats (riparian and wetland areas) are planned to be preserved under SEIS Alternatives 5 and 6, and therefore significant impacts to any individuals on the project site will be avoided. However, development around the smaller, isolated wetlands could impact dispersal and connectivity to and from this habitat, which could adversely impact individuals, should they inhabit this area.

A habitat of greatest conservation need, the Columbia basin foothill riparian woodland & shrubland habitat type, is associated with the lower Cle Elum River corridor areas of the 47° North / Bullfrog Flats project site. This habitat is characterized by an association with black cottonwood (*Populus balsamifera*), as well as white alder (*Alnus rhombifolia*), quaking aspen (*Populus tremuloides*), water birch (*Betula occidentalis*), and ponderosa pine (*Pinus ponderosa*). The most imminent threats to this habitat type include: overharvesting, climate change, agriculture and aquaculture side effects, dams and diversions, invasive species, and roads and development (WDFW 2015). As discussed in the Draft SEIS plants and animals report (Raedeke Associates, Inc. 2020), SEIS

Alternative 5 and 6 would retain the Cle Elum River and associated riparian and wetland habitats in a designated natural open space area, thus avoiding project impacts to these habitats.

4.0 HABITAT CONNECTIVITY AND WILDLIFE DISPERSAL

The plants and animals report for the Draft EIS (Raedeke Associates, Inc. 2020) addressed the potential impacts resulting from overall habitat removal and fragmentation during development of the project site. One of these potential impacts includes fragmentation of habitat on-site. Although the habitat on-site will become more fragmented as a result of the project development, areas including the 160-acre river corridor in the southwestern portion of the project site would be retained and this area would remain contiguous with other offsite open space, including the Washington State Horse Park and adjacent lands, as well as extensive open space on the Suncadia site, separated only by Bullfrog Road. In addition, many natural open space areas are proposed between the various RV, residential, and recreational areas that are contiguous with off-site open space. These segments of retained open space areas will continue to provide connectivity from the other open space areas to the south in the Washington State Horse Park as well as the large tracts of remaining vegetated areas to the north and west of the project site.

The Washington Wildlife Habitat Connectivity Working Group's Statewide and Columbia Plateau Analysis (WHCWG 2010, 2012) identified at least portions of the of the site as Habitat Concentration Areas for beaver and western toad and connectivity corridors for mule deer. The preserved open space areas previously mentioned will still function to provide some connectivity for these species, particularly beaver and western toad, who will be primarily located along the Cle Elum River corridor. If western toads were to occur within the smaller, isolated wetlands on site, the proposed RV park under SEIS Alternative 6 or residential development under SEIS Alternative 5 could isolate these wetlands and have the potential to hinder dispersal across access roads to nearby terrestrial habitats. However, western toads typically breed in permanent waters such as ponds and river side channels (WDFW 2021c) and are unlikely to breed in these seasonal wetlands onsite. Potentially suitable habitat in Bullfrog Pond offsite to the north is likely diminished by the presence of bullfrogs, which prey on western toads.

4.1 Surrounding Land-Use Changes and Habitat Connectivity

In addition to the proposed development at the 47° N / Bullfrog Flats project site, adjacent and nearby areas that were once characterized by natural habitat have become more fragmented and developed in recent years. The Cle Elum and Roslyn area have undergone significant changes in terms of human population density and overall land-use changes along the highways, and on the Suncadia Resort property. These changes have led to an overall reduction in habitat quantity and quality. However, a significant portion of the Suncadia property remains as natural and managed open space, and the surrounding forest lands remain. The development of the 47° N / Bullfrog Flats project site will further

contribute to these land-use and habitat composition changes, although, as discussed in the plants and animals report for the Draft SEIS (Raedeke Associates, Inc. 2020), the river corridor and much of the highest quality habitat on-site would be retained in open space areas (see DSEIS Appendix E).

4.2 Habitat Connectivity as outlined by The Washington Wildlife Habitat Connectivity Working Group

A number of Habitat Concentration Areas (HCAs) and Least-Cost Pathways were identified in the state within both Statewide Analysis and the Columbia Plateau Ecoregion documents produced by The Washington Wildlife Habitat Connectivity Working Group (WHCWG). A habitat concentration area can be defined as “significant habitat areas that are expected or known to be important for focal species based on actual survey information or habitat association modeling” (WHCWG 2010). A least-cost pathway can be described as a “continuous swath of land expected to encompass the best route for species to travel between habitat blocks” (WHCWG 2012). These are both identified by the WHCWG as important to conserve to ensure species retain mobility and connectivity between patches of habitat to best ensure overall species population health and genetic diversity. HCAs for western toad and beaver are indicated on and in the vicinity of the 47° North / Bullfrog Flats project site (WHCWG 2010) and a least-cost pathway between two black-tailed/mule deer HCAs is also indicated at the project site (WHCWG 2012, Jennifer Nelson, WDFW, personal communication, January 2021).

Spatial data received from Jennifer Nelson at WDFW (Pers. Comm. Jan 2021) indicates the western toad habitat concentration area on the 47° North / Bullfrog Flats project site is located within the areas adjacent to the Cle Elum River corridor. There is also a western toad HCA located northwest of the project site, on the northwest side of Bullfrog Road and extending up into the Suncadia resort. The western toad HCAs will be preserved under SEIS Alternatives 5 and 6, providing connectivity to the HCA located to the northwest of the project site. Least-cost pathways are identified for the western toad by the WHCWG (2010), but they are located south of I-90 and continuing further to the south.

The HCAs for beaver identified on and near the project site are more widespread than the western toad HCAs and include the Cle Elum River corridor (extending north into Suncadia) and portions of the plateau spanning across the central portion of the project site. Under SEIS Alternative 6, the managed and river corridor open space areas would preserve the beaver HCA within the Cle Elum River Corridor, and this area represents the most likely primary habitat in the area for beavers. Many areas off-site, such as the Washington State Horse Park and the Suncadia Resort, contain beaver HCAs and will continue to provide some functional connectivity through the landscape.

A least-cost pathway for black-tailed/mule deer is identified on WDFW spatial data (Jennifer Nelson, WDFW, Pers. Comm., January 2021) as generally extending northeast from habitat in the mountains north of Cle Elum, across SR 903, southwesterly through the

central plateau portion of the project site, and across I-90 and extending farther to the southwest. Development of the 47° North / Bullfrog Flats project site may alter portions of this connectivity pathway, but open space areas through the powerline corridors and through the forested areas in and adjacent to the Washington State Horse Park, as well as the forests along the river corridor, would continue to provide avenues of movement through the area. That the existing least-cost pathway crosses I-90, as well as SR 903 and the school and transfer station to the northeast of the site, indicates that deer can currently utilize this pathway and are adapted to some level of disturbance.

The Washington SWAP spatial data indicates many patches of imperiled habitats in the southwestern portion of the 47° North / Bullfrog Flats project site. These habitats areas depicted as imperiled to critically imperiled are contained within the Cle Elum River Corridor area on the project site. All of these imperiled habitat areas found on site would be retained with a large buffer under SEIS Alternatives 5 and 6.

5.0 LIMITATIONS

We have prepared this document for the exclusive use of the City of Cle Elum, EA Engineering, Science, and Technology, Inc., and their consultants. No other person or agency may rely upon the information, analysis, or conclusions contained herein without permission from them.

The determination of ecological system classifications, functions, values, and boundaries is an inexact science, and different individuals and agencies may reach different conclusions. We cannot guarantee the outcome of such agency determinations. Therefore, the conclusions of this document should be reviewed by the appropriate regulatory agencies prior to any detailed site planning or construction activities.

We warrant that the work performed conforms to standards generally accepted in our field, and has been prepared substantially in accordance with then-current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by the project proponent and their consultants, together with information gathered in the course of the study. No other warranty, expressed or implied, is made.

Thank you for the opportunity to provide this information. If you have any questions or need additional information, please do not hesitate to contact me at (206) 525-8122 or via email at rwlundquist@raedeke.com.

6.0 LITERATURE CITED

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